1	Brad Yamauchi, SBN 73245 Kevin R. Allen, SBN 237994		
2	MINAMI TAMAKI, LLP 360 Post Street, 8th Floor		
3	San Francisco, CA 94108 Tel. (415) 788-9000		
4	Fax (415) 398-3887 byamauchi@minamitamaki.com		
5	kallen@minamitamaki.com		
6	Attorneys for Defendants NTH CONNECT TELECOM, INC.		
7	and STEVEN CHEN		
8	Adam Wang, SBN 201233 LAW OFFICES OF ADAM WANG		
9	12 South First Street, Suite 613 San Jose, CA 95113		
10	Tel. (408) 292-1040		
11	Fax. (408) 416-0248 adamqwang@gmail.com		
12	Tomas E. Margain, SBN 193555		
	LAW OFFICES OF TOMAS E. MARGAIN 1550 Bryant Street, Suite 725 San Francisco, CA 94103		
13			
14	Tel. (415) 861-9600 Fax. (415) 861-9622		
15	margainlaw@hotmail.com		
16	Attorneys for Plaintiffs VLADIMIR BALAREZO and OSMIN AVILA		
17	UNITED STATES DISTRICT COURT		
18			
19	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
20	SAN JOSE DIVISION		
21	WIADDAD A DALADEZO : I' : I II II II	C N C 07 05242 IE (BSC)	
22	VLADIMIR A. BALAREZO, individually and) on behalf of others similarly situated,		
23	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE	
24	vs.	MANAGEMENT CONFERENCE	
25	NTH CONNECT TELECOM, INC., AND		
26	STEVEN CHEN,		
27	Defendants.		
28			
20			

1	Pursuant to Local Rule 6-2, the parties, by and through their respective attorneys, hereby	
2	stipulate and respectfully request this Court continue the Case Management Conference scheduled	
3	for August 5, 2011.	
4	1. Lead trial counsel for the Defendant has a pre-existing scheduling conflict that he was	
5	unable to move and therefore desires a continuance of the August 5, 2011 Case	
6	Management Conference for two weeks so that he may participate in the conference.	
7	2. Plaintiffs' counsel has no objection to the continuance;	
8	3. The parties request that the Case Management Conference be continued until 10:30 a.m. on	
9	Friday, August 19, 2011;	
10	4. The parties further request that the date by which to file a Joint Case Management	
11	Statement be continued to August 12, 2011, one week prior.	
12	IT IS SO STIPULATED:	
13	DATED: August 2, 2011 Respectfully submitted,	
14	MINAMI TAMAKI LLP	
15	By: /s/ Kevin R. Allen	
16	By: /s/ Kevin R. Allen Brad Yamauchi Kevin R. Allen	
17	Attorneys for Defendants NTH CONNECT TELECOM, INC. and STEVEN CHEN	
18	DATED: August 2, 2011 Respectfully submitted,	
19	LAW OFFICES OF ADAM WANG	
20	LAW OFFICES OF ADAM WANG	
21	By: /s/ Adam Wang Adam Wang	
22	Tomas E. Margain Attorneys for Plaintiffs VLADIMIR	
23	BALAREZO and OSMIN AVILA	
24		
25		
26		
27		
28		

-{PROPOSED}] ORDER PURSUANT TO STIPULATION, IT IS ORDERED THAT: The Case Management Conference that is currently set for August 5, 2011 at 10:30 a.m. is hereby continued to August 19, 2011 at 10:30 a.m. and a Joint Case Management Conference Statement is due filed one week prior, on August 12, 2011. IT IS SO ORDERED: DATED: ______, 2011 HONORABLE JEREMY FOGEL UNITED STATES DISTRICT JUDGE